

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

KNIFE RIGHTS INC., *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, *et al.*,

Defendants.

Civil Action No. 4:23-cv-547-O

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF DEADLINES IN  
BRIEFING SCHEDULE**

Plaintiffs respectfully request that the Court grant a two-week extension of all current briefing deadlines in this Court's most recent Order (ECF No. 17) for Plaintiffs' forthcoming motion for summary judgment and Defendants' forthcoming cross-motion to dismiss. Defendants consent to Plaintiffs request and a proposed order will be submitted separately.

Plaintiffs commenced this action on June 1, 2023 (ECF No. 1), challenging as unconstitutional 15 U.S.C. §§ 1242-43, which concern switchblade knives. On June 9, 2023, Plaintiffs completed service of process on the United States Department of Justice. ECF No. 10.

On July 24, 2023, the parties submitted a joint motion to establish a proposed briefing schedule for Defendants' forthcoming motion to dismiss Plaintiffs' Complaint. ECF No. 14. This Court granted the parties' joint motion on July 25, 2023. Thereafter, the parties met and conferred regarding Plaintiffs' intent to file a motion for summary judgment. The parties then filed another joint motion to adopt a similar briefing schedule for Plaintiffs motion for summary judgment that the Court granted on August 21, 2023. ECF No. 17.

Most recently, Plaintiffs' counsel has had several unexpected calendar commitments on other matters and more time is needed to sufficiently complete the summary judgment motion, the legal memorandum, and supporting evidence. Plaintiffs' counsel has met and conferred with Defendants' counsel regarding a request for a two-week extension of all deadlines in the current scheduling order. Defendants' counsel does not oppose, and consents to this request. Accordingly, the parties have conferred and Plaintiffs request that the Court adopt the following revised deadlines for briefing both Plaintiffs' and Defendants' prospective motions:

- On or before October 6, 2023, Plaintiffs will file their motion for summary judgment,
- On or before November 3, 2023, Defendants will file their opposition and Cross-Motion to Dismiss,
- On or before December 1, 2023, Plaintiffs will file their Opposition and Reply, and
- On or before December 22, 2023, Defendants will file their Reply.

The parties also respectfully request that Defendants' deadline to respond to the Complaint be extended to November 3, 2023.

The parties appreciate the Court's consideration.

Dated: September 19, 2023

Respectfully submitted,

/s/ John W. Dillon  
John W. Dillon  
*Attorneys for Plaintiffs*

**CERTIFICATE OF CONFERENCE**

The parties conferred and have agreed about the relief requested herein.

/s/ John W. Dillon  
John W. Dillon  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2023, I electronically filed the foregoing document with the Clerk of Court using this Court's CM/ECF system, which will notify all counsel of record of this filing.

/s/ John W. Dillon  
John W. Dillon  
Attorney for Plaintiffs